

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

DONALD J. TRUMP,

Plaintiff,

Case No. 23-cv-21377-DPG

v.

MICHAEL D. COHEN,

Defendant.

**DEFENDANT'S MOTION FOR ENTRY OF ORDER ON
PLAINTIFF'S REQUEST TO RESCHEDULE HIS DEPOSITION**

Defendant Michael D. Cohen, pursuant to this Court's instructions during the September 28, 2023 hearing, hereby moves the Court to enter the attached order reflecting the Court's rulings on Plaintiff's request to reschedule his October 2, 2023 deposition. The Proposed Order on Plaintiff's Request to Reschedule His Deposition is attached hereto as **Exhibit 1**.

Defendant respectfully requests that this Court enter the Proposed Order on Plaintiff's Request to Reschedule His Deposition and grant such other and further relief as this Court deems just.

Respectfully submitted,

By: /s/ Max A. Eichenblatt

Benjamin H. Brodsky

Florida Bar No. 73748

Max A. Eichenblatt

Florida Bar No. 1025141

BRODSKY FOTIU-WOJTOWICZ, PLLC

200 SE 1st Street, Suite 400

Miami, Florida 33131

Tel: 305-503-5054

Fax: 786-749-7644

bbrodsky@bfwlegal.com

docketing@bfwlegal.com

E. Danya Perry
New York Bar No. 2839983
(admitted *pro hac vice*)
E. DANYA PERRY PLLC
157 East 86th Street, 4th Floor
New York, NY 10028
Tel: 646-349-7550
dperry@danyaperrylaw.com

Lilian M. Timmermann
Florida Bar No. 1033260
E. DANYA PERRY PLLC
700 S. Rosemary St., Suite 204
West Palm Beach, FL 33401
Tel: (646) 357-9953
Fax: (646) 849-9609
ltimmermann@danyaperrylaw.com

Counsel for Defendant Michael D. Cohen

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this September 29, 2023, a copy of this filing was submitted electronically via the CM/ECF system to all parties that have entered an appearance in this case and on the Court's electronic system.

Max A. Eichenblatt

By: /s/ Max A. Eichenblatt